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-and-

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Co-counsel for Gemini Trust Company, LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*¹

Debtors.

GEMINI TRUST COMPANY, LLC, for
itself and as agent on behalf of the Gemini
Lenders,

Plaintiff,

v.

GENESIS GLOBAL CAPITAL, LLC,
GENESIS GLOBAL HOLDCO, LLC, AND
GENESIS ASIA PACIFIC PTE. LTD.,

Defendants.

Chapter 11

Case No. 23-10063 (SHL)

(Jointly Administered)

Adv. Pro. No. 23-011920-shl

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these chapter 11 cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

**NOTICE OF APPEARANCE AND REQUEST FOR
SERVICE OF ALL PLEADINGS AND DOCUMENTS**

PLEASE TAKE NOTICE that, pursuant to section 1109(b) of Title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Willkie Farr & Gallagher LLP hereby appears in the above-captioned cases of Genesis Global Holdco, LLC and its affiliated debtors and debtors in possession (the “Debtors”) as counsel to Gemini Trust Company, LLC (“Gemini”) and requests, pursuant to Bankruptcy Rules 2002, 9007 and 9010, and Bankruptcy Code section 342, that all papers, pleadings, motions and applications served or required to be served in this case, be given to and served upon the following:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and the papers referred to in the Bankruptcy Rules and the Bankruptcy Code specified

above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by ordinary mail, hand delivery, telephone, facsimile, electronic mail, or otherwise, which may affect or seek to affect in any way any rights or interests of Gemini with respect to the Debtors' estates, or any related entities, or property or proceeds thereof in which the Debtors' estates may claim an interest.

PLEASE TAKE FURTHER NOTICE that this appearance shall not be deemed or construed to be a waiver of the right of Gemini (i) to have final orders in non-core entered only after *de novo* review by a District Judge, (ii) to trial by jury in any proceeding so triable in these cases or any case, (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, setoffs, or recoupments to which Gemini is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments Gemini expressly reserves.

Dated: New York, New York
November 10, 2023

WILLKIE FARR & GALLAGHER LLP

By: /s/ Daniel I. Forman
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